

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHEVRON CORPORATION,

Plaintiff,

vs.

STEVEN DONZIGER, et al.,

Defendants.

CASE NO. 11-CV-0691-LAK

**STEVEN DONZIGER'S AND THE LAW OFFICES OF STEVEN R. DONZIGER'S
NOTICE OF MOTION TO DISMISS CHEVRON'S COMPLAINT**

TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law dated the 30th day of March, 2011, Defendants Steven Donziger and The Law Offices of Steven R. Donziger (collectively, "Donziger"), by and through undersigned counsel, shall move, and hereby do move, this Court before the Honorable Lewis A. Kaplan, at the United States Courthouse for the Southern District of New York, Courtroom 12D, 500 Pearl Street, New York, New York 10007, at such time as counsel may be heard, for an Order, pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing Chevron's Complaint with prejudice and for other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that counsel for Donziger hereby requests oral argument.

Dated: March 30, 2011

By: /s/ Elliot R. Peters
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